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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 TI'A JOSEPH, an individual;

10 Plaintiff,

11 v.

12 ELITE MEDICAL CENTER, LLC, a
 13 Domestic Limited-Liability Company;

14 Defendant.

Case No.: 2:22-CV-00703-JAD-NJK

15 **STIPULATION AND [PROPOSED]
 16 ORDER EXTENDING TIME TO FILE
 17 PLAINTIFF'S OPPOSITION TO
 18 DEFENDANT'S MOTION TO COMPEL
 19 ARBITRATION (ECF NO. 19)**

20 **(Second Request)**

21 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

22 Plaintiff TI'A JOSEPH ("Plaintiff") and Defendant ELITE MEDICAL CENTER, LLC
 23 ("Defendant"), by and through their counsel of record, hereby stipulate and agree to take that the
 24 court approve the extension of time for Plaintiff to file her response to Defendant's Motion to
 25 Compel Arbitration [ECF No. 19] filed on July 8, 2022. Plaintiff's response is currently due on
 26 August 5, 2022 per the Court's Order [ECF No. 21]. This is the second request for an extension of
 27 time to oppose the Motion.

28 Plaintiff's counsel, which is a small firm of only two attorneys, is currently preparing for a
 29 two-week long trial in the United States District Court, District of Nevada, Case No. 2:17-cv-00880-
 30 JCM-VCF, which will be commencing on August 8, 2022. The partner of the firm is lead trial
 31 counsel in that case. The associate attorney has also been assisting in preparation for that trial and
 32 has to devote more time than was anticipated to assisting in the trial. Additionally, Plaintiff's firm
 33 has been short staffed, as two of its law clerks were out the entire month of July preparing and taking
 34 the Nevada State Bar. The partner of firm and office manager also were out of office during parts of

1 July after testing positive for COVID-19. Additionally, the firm's head paralegal just recently
 2 returned from maternity leave. As a result, Plaintiff's firm has been significantly hindered in its
 3 ability to devote adequate time to drafting a response due to the extensive trial preparations and
 4 being short staffed. The parties aver that this is the second stipulation for an extension of time with
 5 respect to this Motion, that the requested extension will not alter any date previously set by the Court
 6 in this matter, and this request is made in good faith and not for purposes of delay.

7 IT IS HEREBY STIPULATED AND AGREED that Plaintiff's Opposition to Defendant's
 8 Motion to Compel Arbitration shall be due **August 15, 2022**.

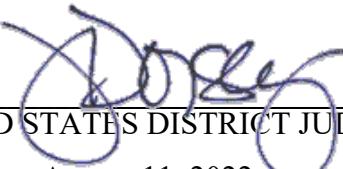
9 DATED this 4th day of August 2022

10 */s/ Cory M. Ford*
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DATED this 4th day of August 2022

18 */s/ Crane M. Pomerantz*
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27 IT IS SO ORDERED.

28 
 1 UNITED STATES DISTRICT JUDGE
 2 DATED: August 11, 2022

LAGOMARSINO LAW

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